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Problem

There are perceived health hazards associated with the continued presence of vermiculite containing insulation present in homes and on property after aggressive clean-up procedures have been deemed complete by CDM and the Volpe Center. These problems are present even after the properties have passed the aggressive testing procedures established by the EPA guidelines for Operable Unit 4.

Background Information

The concerns brought forth in this White Paper stem from statements made by:

person(s) whose property has been cleaned up and perceive inconsistencies from what they expected as a result of the on-site work plans developed during the pre construction meetings

person(s) whose property has been cleaned up and in doing minor or major repairs or alterations to their homes get a "face full" of VCI from an area believed clean

person(s) who have witnessed apparent Libby asbestos and VCI left behind on properties that have been pronounced clean by the EPA

person(s) who have witnessed vehicles, machinery and material that are perceived to be contaminated with asbestos spreading this contamination to areas other than the clean-up site

the personal on site experience of the Technical Advisor (Gordon Sullivan) and his wife Cathie during the three week course of the clean-up of their home and property

the personal experiences of other TAG members visiting the site of the Sullivan's clean-up effort

Data/Documents Involved

Personal concerns and perceptions noted above regarding Libby Operable Unit 4 clean-up procedure(s) registered at the 7/8/03 TAG meeting, the 7/10/03 CAG meeting, and a significant number of calls to the TAG.

Risk

Left unanswered, the serious concerns stated above have the potential of compromising the overall integrity, final success and the perceived effectiveness of the EPA clean-up program.

Left unanswered (and if found justified) the concerns of the Libby public could mean a serious compromise to public health and safety through continued exposure after clean-up has been deemed complete by the EPA and its contractors.

Recommended Course of Action

Provide the TAG a copy of all current written policies and procedures enforced or acted upon by the EPA and its contractors relating to the clean-up of homes and property in Libby Operable Unit 4. These policies and procedures will then be analyzed by the TAG Technical Advisor and explained in detail to the TAG and public as to how they meet the EPA documented standards. If this process exceeds the abilities of the Technical Advisor, experts will be hired to aid in the final evaluation.

The TAG continue to solicit detailed information from members of the Libby public who might wish to express concerns relating to the effectiveness of the clean-up process and or the containment of VCI in their homes or businesses.

TAG board members continue to visit on-going work sites familiarizing themselves with particular work techniques, procedures and operable processes that routinely go on at these sites.